



Marjorie L. Hauf, Esq.  
Nevada Bar No.: 8111  
Matthew G. Pfau, Esq.  
Nevada Bar No.: 11439  
Cara Xidis, Esq.  
Nevada Bar No.: 11743  
H&P LAW  
8950 W Tropicana Ave., #1  
Las Vegas, NV 89147  
702 598 4529 TEL  
702 598 3626 FAX  
e-file@courtroomproven.com Attorneys  
for Plaintiff

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \*

**Susan Hoy**, as Guardian Ad Litem for  
**J.M. and I.M.**, minors,

Plaintiffs,

vs.

**Andrea Hernandez; Waldo  
Hernandez; Lisa Brochu; Kim Kallas;  
Lisa Ruiz-Lee; Paula Hammack; DOE**  
Individuals I-X; ROE Clark County  
Department of Family Services  
Employees XI-XX, individually and in  
their official capacities; **County of Clark**,  
a political subdivision of the State of  
Nevada; and ZOE Corporations XXI-XXX

Defendant.

Case No.: 2:20-cv-00103-CDS-VCF

**Stipulation and Order  
(3<sup>rd</sup> Request)**

WHEREAS Plaintiff's counsel's office moved on Friday, June 17, 2022, during which time their servers containing the client files and documents crashed;

WHEREAS Plaintiff's counsel is in the process of recovering the files from the cloud server, but that will not be completed until at least June 27, 2022; and

WHEREAS Plaintiff's counsel needs access to Plaintiff's file in documents in order to complete and finalize the responses to Defendants' respective motions for summary judgment and joinders thereto;



1 IT IS HEREBY STIPULATED, by and between the parties hereto, by and through  
2 their respective counsel of record, that the deadline for Plaintiff to file her Response  
3 to Defendants' respective Motions for Summary Judgment (ECF Docs. 90 and 91) and  
4 Joinders thereto (ECF Docs 96-98) be extended from June 23, 2022, to July 1, 2022.

5 This is Plaintiff's third request for an extension and this stipulation is submitted  
6 in good faith and without the purpose of undue delay.

7 Dated this 21st day of June, 2022.

8 H&P LAW

OLSON, CANNON, GORMLEY, ANGULO &  
STOBERSKI

9  
10 /s/ Marjorie Hauf

/s/ Felicia Galati

11 MARJORIE HAUF ESQ.  
12 Nevada Bar No. 8111  
Attorney for Plaintiff

13 FELICIA GALATI, ESQ.  
14 Nevada Bar No. 7341  
15 Attorney for Defendants, Lisa Ruiz-Lee,  
16 Paula Hammack, Kim Kallas and County of  
17 Clark

18 WILEY PETERSON LAW OFFICES

KEATING LAW GROUP

19 /s/ Jonathan Blum

/s/ Julie Funai

20 Jonathan Blum, Esq.  
21 Nevada Bar No. 9515  
22 Attorney for Defendant,  
23 Lisa Brochu

24 Julie Funai, Esq.  
25 Nevada Bar No. 8725  
26 Attorneys for Defendants,  
27 Andrea Hernandez and Waldo Hernandez

28 IT IS SO ORDERED.

Dated this 23rd day of June, 2022.

  
UNITED STATES DISTRICT JUDGE